



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

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OFFICE OF
ECOSYSTEMS, TRIBAL AND
PUBLIC AFFAIRS

November 21 2011

Scott Conroy, Forest Supervisor:
C/O David Krantz, Project Lead
Forest Supervisor's Office
3040 Biddle Road
Medford, Oregon 97504

Re: U.S. Environmental Protection Agency (EPA) review and comments on the Draft Supplemental Environmental Impact Statement (DSEIS) for Motorized Vehicle Use on the Rogue River-Siskiyou National Forest (Forest) . EPA Region 10 Project Number: 08-053-AFS.

Dear Mr. Conroy,

This review was conducted in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act. Under our policies and procedures, we evaluate the environmental impact of the proposed action and the adequacy of the impact statement. We have assigned an LO (Lack of Objections) rating to the DSEIS. A copy of the EPA rating system is enclosed.

In our February 22, 2010 comment letter on the Final EIS and Record of Decision (ROD)¹ we described how the FEIS was responsive to our concerns and recommendations on the DEIS, and provided details and recommendations relating to what was our primary remaining environmental concern - risk to human health from exposure to Naturally Occurring Asbestos (NOA).

To address our concern that the FEIS and ROD's mitigation measures to reduce the risk of exposure to NOA may not provide full protection of human health, we recommended that the Forest develop and implement a specific plan to address risk of NOA exposure. The DSEIS's proposal for a NOA informational webpage and visitor pamphlets available at ranger stations² is responsive to our NOA risk reduction recommendations.

We also appreciate the DSEIS's disclosure of specific NOA exposure risk reduction strategies from Forest Service Region 5. To increase the effectiveness of the stated strategy to conduct site-specific analysis for route changes to determine if the ground surface poses a health risk due to presence of asbestiform fibers,³ we recommend that the FSEIS address how results from these analyses would be considered in travel management including future Motor Vehicle Use Map updates.

¹ Available online at: [http://yosemite.epa.gov/oeca/webeis.nsf/\(PDFView\)/20100006/\\$file/20100006.PDF?OpenElement](http://yosemite.epa.gov/oeca/webeis.nsf/(PDFView)/20100006/$file/20100006.PDF?OpenElement)

² DSEIS, p. II-53

³ Ibid.

Please contact me at (206) 553-1601 or by email at reichgott.christine@epa.gov, or you may contact Erik Peterson of my staff at (206) 553-6382 or by email at peterson.erik@epa.gov with any questions or concerns regarding this review.

Sincerely,



Christine B. Reichgott, Manager
Environmental Review and Sediment Management Unit

Cc: David Krantz, Project Lead

Enclosure

**U.S. Environmental Protection Agency Rating System for
Draft Environmental Impact Statements
Definitions and Follow-Up Action***

Environmental Impact of the Action

LO – Lack of Objections

The U.S. Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC – Environmental Concerns

EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

EO – Environmental Objections

EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU – Environmentally Unsatisfactory

EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

Category 1 – Adequate

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2 – Insufficient Information

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

Category 3 – Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.